

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

SCOTT D. CREECH
PLAINTIFF.

V.

OHIO DEPT OF REHABILITATION
AND CORRECTIONS, ET AL.

DEFENDANT.

CASE No. 2:19-CV-001

JUDGE: JAMES L. GRAHAM

MAGISTRATE JUDGE;
CHELSEY M. VASCURA.

FILED
RICHARD W. NAGEL
CLERK OF COURT
2020 AUG 28 PM 1:49
U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

MOTION TO SUPPLEMENT EXHIBIT-A OF PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT FILED ON AUGUST 2020.

RESPECTFULLY SUBMITTED

Scott D. Creech

SCOTT D. CREECH
C.C.I # 588-782
P.O. BOX 5500
Chillicothe, Ohio 45601

MEMORANDUM IN SUPPORT

As stated in previous filings and also in the deposition of the plaintiff held on November 8 2019, the plaintiff suffers from mental illnesses and/or injuries that hamper his ability to function in normal day to day activities and greatly hamper's his ability to try to act as his own attorney pro se. Plaintiff often has memory lapses and severe states of confusion. These are symptoms of a traumatic brain injury. (SEE Handbook on brain injury in EXHIBIT-A of plaintiff's summary judgment motion Chapter 4.) Being a prisoner only further complicates the above stated issues and prevents him from being able to fully concentrate on his legal work, this is especially true now that our (inmates) only access to law material has been taken from us due to the COVID-19 virus, because the institution law library is closed.

Plaintiff has no money to afford a private attorney and representing himself in this matter is nearly impossible under these conditions with or without a traumatic brain injury. However the injury makes it impossible to concentrate while 200 inmates are yelling and screaming in the dorm that he is confined in, as well as approximately 40 high velocity fans that run 24 hours a day. All of this places him at a great disadvantage, especially when his symptoms are activated by the stress and he gets double vision and vertigo. Furthermore, the issue is very complex.

In the process of trying to work under these conditions with my living arrangements and my brain injury I left out 6 very important pages of records regarding medical examinations. Plaintiff now seeks to supplement the record with the remaining portion of EXHIBIT-A.

The missing pages from EXHIBIT-A are attached and labelled supplement to Exhibit-A.

Plaintiff requests this court grant this motion in the interest of fairness and justice, and allow the exhibit to be supplemented to complete the already admitted evidence, Exhibit-A (medical record) of his motion for summary judgment filed in August 2020.

RESPECTFULLY REQUESTED

Scott D Creech
Scott D Creech
C.C.I # 588-782
P.O.BOX 5500
Chillicothe, Ohio 45601

CERTIFICATE OF SERVICE

I Scott Creech hereby certify that a true copy of this motion has been sent to counsel of records, Thomas E. Madden by regular U.S. Mail, at 150 Gay street, 16th Floor, Columbus Ohio 43215 On this 26th day of Aug 2020.

Scott D Creech

GRANT MEDICAL CENTER
OhioHealth
RADIOLOGY SERVICES
111 S. GRANT AVE.
COLUMBUS, OH 43215
(614) 566-9530

NAME: CREECH, SCOTT

D.O.B.: [REDACTED] Age: 42Y SEX: M
ACCT. NO: 9922200165
UNIT NO: G000738801
ROOM/PT TYPE: ICU-315-A I/P
EXAM DATE: 08/10/99

ATTENDING PHYSICIAN:

CHOW, STUART J
300 E. TOWN STREET
COLUMBUS OH 43215

ORDERING PHYSICIAN:

CHOW, STUART J
300 E. TOWN STREET
COLUMBUS OH 43215

Chk-in #	Order	Exam	
595818	0012	7014	CT-BRAIN WITHOUT DYE
			Ord Diag: TRAUMA

CT OF THE BRAIN:

The patient was scanned without injection of intravenous contrast. He does appear to have subarachnoid blood surrounding his brain stem, in the suprasellar cistern and around the circle of Willis. I do not see subarachnoid blood in the posterior fossa, although he does have considerable artifact related to beam hardening. I note that this patient is intubated. There is no extra-axial collection. His head is canted in the gantry, but I do not see mass effect. I do note a fluid level in the right antrum and it does appear that the anterior wall of the right maxillary antrum is probably fractured. He has ethmoid sinus disease as well of uncertain age.

IMPRESSION: Subarachnoid hemorrhage in a trauma patient.

WG
Read By: Jean R. Paquet MD
Released By: Jean R. Paquet MD
Released On: 08/10/99 1420

*In order for the report to have been electronically released,
it was reviewed by the Radiologist.

FINAL

Supplement To

Exhibit - A

GRANT MEDICAL CENTER
OhioHealth
RADIOLOGY SERVICES
111 S. GRANT AVE.
COLUMBUS, OH 43215
(614) 566-9530

NAME: CREECH, SCOTT

D.O.B.: [REDACTED] Age: 42Y SEX: M
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ORDERING PHYSICIAN:

CHOW, STUART J
300 E. TOWN STREET
COLUMBUS OH 43215

Chk-in #	Order	Exam	
596158	0050	5129	GD-PORT CHEST, AP/PA Ord Diag: TRAUMA

*** Portable **

CHEST: AP portable view obtained at 1230 hours show generalized increased density throughout the left lung with shift of the heart and mediastinum to the left, highly suggesting atelectasis of the left lung. The right lung is grossly clear. Right chest tube remains in place. Endotracheal tube and nasogastric tube are in place.

IMPRESSION: Atelectasis of the left lung since previous study.

GW

Read By: S. Christopher Lee MD
Released By: S. Christopher Lee MD
Released On: 08/11/99 1422

*In order for the report to have been electronically released,
it was reviewed by the Radiologist.

FINAL

** Portable **

GRANT/RIVERSIDE METHODIST HOSPITALS

GRANT CAMPUS

111 SOUTH GRANT AVE.

COLUMBUS, OHIO 43215

DISCHARGE SUMMARY--GRANT MEDICAL CENTER

Patient Name: CREECH, SCOTT

Billing Number: 9922200165

Date of Admission: 08/10/1999

Date of Discharge: 08/24/1999

Attending Physician: STUART J. CHOW, D.O.

MR Number: 000-738-801

It is to be noted that I was never in the direct care of this patient at any time.

PRIMARY DIAGNOSIS Traumatic subarachnoid hemorrhage.

SECONDARY DIAGNOSES

- 1) Traumatic pneumothorax.
- 2) Multiple rib fractures.
- 3) Pneumonia.
- 4) Open wound scrotum and testes.
- 5) T spine compression fracture.
- 6) Anemia, secondary to acute blood loss.

SIGNIFICANT FINDINGS The patient was found to have a T7-8 compression fracture on plane films and CT of the thoracic spine. The patient was found to have multiple rib fractures on the right and pneumothorax on the right on plane films of the chest. The patient was found to have an AC joint separation of the right shoulder as well on plane films. He also had CT of the face, which showed old mandibular fractures with compression plates present. CT of the brain showed a subarachnoid hemorrhage.

PROCEDURES PERFORMED

- 1) CT of the head.
- 2) CT of the thoracic spine.
- 3) CT of the facial bones.
- 4) Thoracostomy tube.
- 5) Mechanical ventilation for 96 plus hours.
- 6) Oral intubation.
- 7) Ultrasound of the abdomen or fast scan in the trauma bay.

HOSPITAL COURSE The patient was admitted to the ICU and placed on a ventilator. Dr. Yashon was consulted regarding a subarachnoid hemorrhage. Orthopedics was consulted regarding a T spine compression fracture. Dr. Poka was the orthopedic surgeon. The patient was eventually weaned from the vent and thoracostomy tube was able to be removed as well. The patient was discharged in stable condition to Grant South Rehabilitation Center.

DISCHARGE ORDERS Included seating precautions to put the patient on aspiration precautions. Special instructions - Activity was to be for PT, OT and ST. The patient needed a routine wound care to clean the wounds

DISCHARGE SUMMARY
Page 1 of 2

MEDICAL RECORD COPY



5

GRANT/RIVERSIDE METHODIST HOSPITALS

GRANT CAMPUS

111 SOUTH GRANT AVE.

COLUMBUS, OHIO 43215

DISCHARGE SUMMARY

Patient Name: CREECH, SCOTT

Billing Number: 9922200165


MR Number: 000-738-801

with soap and water, specifically the wound in the scrotal region. The patient was to have a mechanical soft diet with thickened liquids and feeding precautions. The thickened liquids are to be of pudding consistency. The patient was considered a high aspiration risk. The patient was to sit upright, small bite, swallow with each bite. Supervision was to be given with all meals. The patient was to use oxygen 4 liters by nasal cannula and wean to room air as tolerated and keep that at 92% or above.

MEDICATIONS Pepcid 20 mg p.o. q 12 hours, Saline/Hepwell q 8 hours, Robitussin 200 mg q 6 hours p.o., Bayer aspirin 325 mg p.o. q.d., Cipro 500 mg q 12 hours times seven days, Ativan 1 to two p.o. or IV q 2 hours as needed for anxiety and sedation, Percocet one to two by mouth q4-6 hours as needed, Dulcolax rectal suppositories q.d. as needed.

FOLLOWUP The patient was to followup with Dr. Yashon, Neurology and Dr. Posal Orthopedics and also the trauma clinic after discharge from the rehabilitation center. Any traumas by Grant South Rehab were to call the Trauma Case Managers and the patient was discharged in stable condition for inpatient rehabilitation at Grant South Rehab.

Dictated by Lisa Henning, D.O.

Signature: 

Dict: STUART J. CHOW, D.O.

D: 10/05/1999 9:00 A

T: 10/08/1999 8:42 P tra

Job ID #: 375555 Document #: 549265

CC: STUART J. CHOW, D.O.

DISCHARGE SUMMARY

Page 2 of 2

MEDICAL RECORD COPY

6

Scott Creech 588782

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Chillicothe, Ohio
45601

INMATE MAIL COLOR
Chillicothe Correctional
P.O. BOX 5500
Chillicothe, Oh 45601



Barn Swallow

Office of the Clerk
U.S. District Court
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Columbus, Ohio
43215-282346

43215-282346